

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05-10343-GAO

_____)
ROBERT F. KEESE III,)
)
Plaintiff)
)
V.)
)
M/V PANORMOS, her engines, tackle,)
machinery, appurtenances, apparel and)
freight, etc., <i>in rem</i> , and MARMARAS)
NAVIGATION, LTD., <i>in personam</i> ,)
)
Defendants)
_____)

JOINT MOTION TO CONTINUE MEDIATION DATE

The parties to this action hereby jointly move that the mediation currently scheduled for October 15, 2007, be continued to November 5 (at 10:30 a.m.) or November 6, 2007. In the event that the Court's schedule will not permit the mediation to proceed on either of these proposed dates, the parties request in the alternative that the mediation be continued to one of the following dates: November 20, December 10 (at 10:30 a.m.), or December 11, 2007.

As grounds for this motion the parties state that they are working cooperatively to exchange information concerning the plaintiff's damages claims, including information contained in a federally maintained database. The requested continuance will permit the parties to obtain, exchange, and evaluate this information prior to the mediation. This motion to continue is not interposed for the purpose of delay, and the parties submit that the requested continuance will permit

them to obtain information that they believe will be of assistance during the course of the mediation.

Respectfully submitted,

By their attorneys,

“/s/ Michael J. Rauworth”

Michael J. Rauworth, BBO# 547711
CETRULO & CAPONE LLP
World Trade Center East – 10th Floor
Two Seaport Lane
Boston, MA 02210
(617) 217-5500
Attorney for the Plaintiff

“/s/ John J. Finn”

John J. Finn, BBO# 166060
FINN & FINN
34 Chamberlain Street
P.O. Box 154
Hopkinton, MA 01748
(508) 497-5019
Attorney for the Defendants

Dated: October 10, 2007